4.2 BIOLOGICAL RESOURCES

The Initial Studies for both the DFPMP and Off-leash Dog Park Location Study (Appendices A and B) found potentially significant impacts to endangered, threatened or rare species or their habitat, natural communities; wetland habitat; and wildlife dispersal or migration corridors. These issues are discussed further in the EIR. Impacts to locally designated historic, landmark, or specimen trees were found to be less than significant for the DFPMP and no impacts were identified for the Off-leash Dog Park Location Study so this issue is not addressed in the EIR.

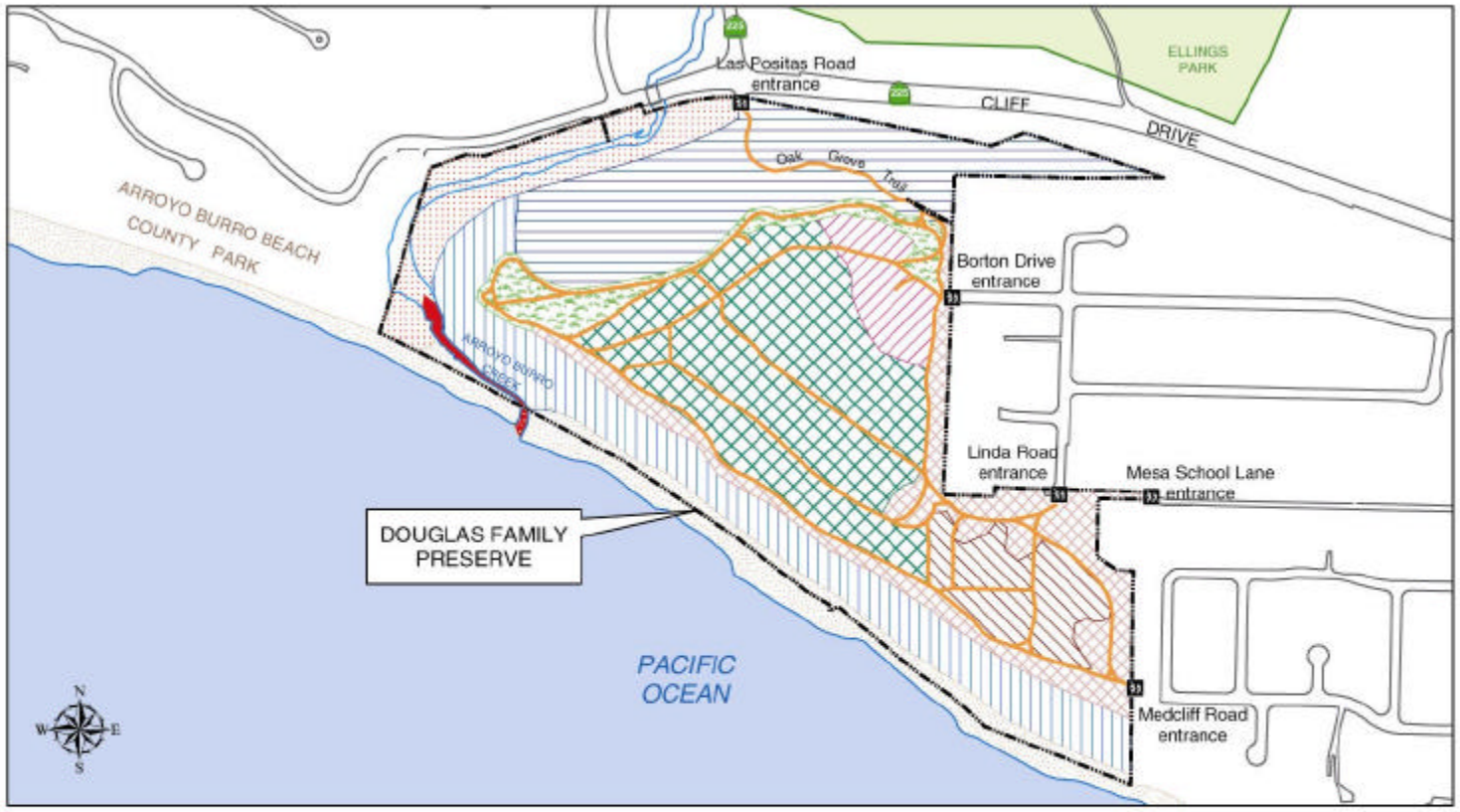
Summaries of the biological setting of the DFP, Shoreline Beach Area, and Hale Park are provided below. A more complete discussion can be found in the Biological Assessments for the Douglas Family Preserve, Shoreline Beach Area, and Hale Park located in Appendix 1 (bound separately). The biological settings and analyses in those reports are incorporated by reference. This section describes the existing biotic resources, project impacts and mitigation measures for plant and animal resources.

4.2.1 Setting

a. Douglas Family Preserve. The Preserve is primarily a flat mesa with the presence of nonnative annual grasses, ornamental species, native, and naturalized trees, and scattered occurrences of coastal sage scrub. The southern and western perimeter of the Preserve consists of coastal bluff scrub on steep slopes descending to the beach and Arroyo Burro Creek. Coast live oak woodland occurs on the steep north and northwest perimeter slopes of the site descending to riparian habitats associated with Arroyo Burro Creek. Arroyo Burro Creek and its associated riparian habitats are located down slope of the coast live oak woodland to the north and northwest, and to the west, down slope from the coastal bluff scrub. Past nursery operations and past planting of ornamental species have reduced the quality and quantity of native plant assemblages occurring on the mesa top. The site has also been disturbed from recreational uses primarily by the establishment of trails used by hikers and bikers. The Preserve supports a variety of wildlife species typical of the region. Some animals are restricted to a particular plant community, while others utilize multiple plant communities.

Habitats. The Douglas Family Preserve supports a variety of habitats described below and illustrated in Figure 4.2-1.

Estuarine – This habitat extends from the mouth of Arroyo Burro Creek to the bridge across Cliff Drive. The estuary changes through the seasons based on whether the mouth of the creek is open to direct tidal influence or is closed so that only minimal seepage from the ocean occurs. Estuaries occur where fresh water from streams mixes with water from the ocean. Large variations in salinity and water levels occur within the estuary due to the indirect influence of the tides and seasonal changes in freshwater runoff from Arroyo Burro Creek and its tributaries. Several fish species occur in this estuary, along with the birds that feed on them. In addition, various shorebirds are found in and around the estuary, feeding on the rich mix of vegetation commonly found in estuaries.



Source: Jones and Stokes

Douglas Family Preserve & Off Leash Dog Park EIR

Douglas Family Preserve Biotic Communities

Figure 4.2-1

Vegetation Type

- Beach
- Estuarine
- Riparian
- Coast live oak woodland
- Coastal bluff scrub
- Coastal sage scrub
- Coastal sage scrub with willow scrub
- Non-native annual grassland with ornamental/exotic
- Ornamental/exotic
- Ruderal

0 125 250 500 750 1,000 1,250 1,500
Feet

Other Features

- Douglas Family Preserve
- City Park
- Shore line
- Road - curb line
- Trail
- Access Point

The tidewater goby, a small fish listed as endangered under the Federal Endangered Species Act, inhabits the Arroyo Burro Creek estuary. In addition, Arroyo Burro Creek, including its estuary, has been designated as Critical Habitat for the Steelhead trout, another species listed as endangered under the Federal Endangered Species Act (see additional discussion of these species below).

Riparian Forest – This habitat is located along the creek tributary that extends from Arroyo Burro Creek up the small valley between Cliff Drive and the oak woodland. Additional habitat is adjacent to the easterly side of Arroyo Burro Creek below the Cliff Drive bridge. This is a moist environment along the banks of creeks and streams. Riparian habitat provides important water, food, and shelter, including nesting and roosting, for many wildlife species.

Willow Scrub – Willow scrub occurs in small, scattered patches throughout the central, eastern and southeastern portion of the Preserve. It is mixed with coastal sage scrub. It is not associated with riparian habitat in the indicated locations. The dominant species is arroyo willow. Areas of willow scrub are considered a wetland using the California Coastal Commission definition. Nonnative annual grasses and other weedy species dominate the under story. The willow scrub community provides limited habitat for wildlife, as this habitat type occurs only sporadically throughout the site. Wildlife species occupying other habitat types will most likely also utilize the willow scrub habitat type.

Coastal Bluff Scrub - Coastal bluff scrub occurs on the western and southern perimeter of the DFP on steep slopes with shallow soils. This habitat is exposed to nearly constant coastal breezes. Within the coastal bluff scrub community surveyed, there is very little occurrence of nonnative species. This habitat type provides cover and abundant sources of food for wildlife.

Coastal Sage Scrub – Coastal sage scrub occurs in scattered locations throughout the DFP, primarily in the central and southeastern portion of the mesa. The coastal sage scrub community has been degraded and exhibits low species diversity. Nonetheless, it supports wildlife, serving primarily as a foraging area.

Nonnative Annual Grassland – The nonnative annual grassland is found throughout the Preserve. This community occurs as a separate individual community, and occurs as the understory of several plant communities, including coast live oak woodland, coastal sage scrub, ornamentals, and exotics. The nonnative annual grassland provides habitat for a variety of species that also utilize adjacent habitat types.

Coast Live Oak Woodland –The coast live oak woodland occurs on the northern and northwestern perimeter of the Preserve along north and northwest facing slopes. The Coastal Commission and the City Local Coastal Plan consider this habitat to be an environmentally sensitive habitat. The community forms an almost continuous closed-canopy corridor. Invasive species have a detrimental effect on the habitat due to

aggressive growth and competition with native plants. The coast live oak woodland provides nesting sites, escape, cover, and food for a variety of wildlife species, including important nesting and roosting habitat for raptors.

Windrows – There are several rows of trees on the DFP, originally planted as part of the nursery to establish windbreaks to protect planted areas on the mesa. Where eucalyptus trees grow, primarily along the bluff and in the southeastern portion of the property, native plants are almost entirely absent due to the acidity of the leaves. There are also windrows of Monterey pine and Monterey cypress, both native to California, but not to this area. Typically, these types of trees are frequently used for nesting and roosting by a variety of raptors (e.g. red-shouldered and red-tailed hawks, barn and great horned owls). Finally, fallen trees, snags and related woody debris provide cover and nesting opportunities for a number of smaller birds. The eucalyptus trees on the Preserve have from time to time supported small numbers (30–100) of monarch butterflies.

Ornamental and Invasive Exotics –The Preserve contains a large number of ornamental species, including Australian brush cherry, giant bird of paradise, *pittosporum*, *myporum*, and laurel fig. These are plant species that are not native to this area, and many of them date from the time the property was used as an ornamental plant nursery. Ornamentals occur throughout the Preserve within most of the communities. Some plants have stayed in the areas where they were originally planted and have not spread elsewhere on the mesa. In some cases, they may contribute to the native habitats in which they are found. Others are highly invasive and have impacted the natural habitats because they have little food value to indigenous wildlife, and compete with the native vegetation.

Ruderal – Ruderal vegetation, or disturbed habitat, includes areas that have been significantly disturbed by agriculture, construction and other land clearing activities. The ruderal community occurs throughout the Preserve adjacent to existing trails and roads. Because of the disturbed nature of this habitat type and low species diversity, the ruderal habitat provides the lowest habitat value for wildlife. This habitat supports some of the small mammals that occur in other habitat types on the DFP and provides some foraging opportunities for birds.

Special-Status Species. The following are the criteria for special-status plant and animal species.

Special-status plant species include:

- Plants that are listed or proposed for listing as threatened or endangered under the federal Endangered Species Act;
- Plants listed on the California Native Plant Society (CNPS) List 1B and List 2 as rare threatened or endangered;
- Plants listed on CNPS List 3 and List 4 as plants about which more information is needed and as plants of limited distribution;
- Plants listed or proposed for listing as rare, threatened, endangered under the California Endangered Species Act;
- Plants listed under the California Native Plant Protection Act;

- Plants that meet the definition of rare or endangered under CEQA; and
- Plants species of local concern.

Special-status animal species include:

- Animals listed or proposed for listing as threatened or endangered under the Federal Endangered Species Act;
- Animals that are considered Federal Species of Concern;
- Animals that meet the definition of rare or endangered under CEQA;
- Animals listed or proposed for listing as rare, threatened, or endangered under the California Endangered Species Act;
- Animal species of special concern to the California Department of Fish and Game (CDFG);
- Animal species that are fully protected in California under CDFG Code, Section 3511 (e.g. raptors and tidal invertebrates); and
- Animal species of local concern.

Based on habitat types found at the DFP, there are several special-status species that could be supported at the DFP. However, further review has shown that many of these species have not actually been observed at the Preserve. The following table outlines those special-status species that have been recorded in the Preserve or have designated Critical Habitats within the Preserve, pursuant to the U.S. Fish and Wildlife Service.

TABLE 4.2-1: Special Status Species Recorded at the DFP or with Designated Critical Habitat at the DFP

Scientific Name	Common Name	Legal Status
Plants		
Baccharis plummerae, ssp. Plummerae	Plummer's baccharis	CNPS List 4
Animals		
Eucyclobius newberryi	Tidewater goby	FE, CSC
Oncorhynchus mykiss	Steelhead – Southern California	FE, CSC
Clemmys marmorata pallida	Southwestern pond turtle	CSC

Plant Status Codes: California Native Plant Society (CNPS), List 4 = plants of limited distribution; a watch list.
Wildlife Status Codes: CSC – California Species of Special Concern, FE – Federal-listed endangered

More detail on the species listed in the above table is included below and in the technical reports referenced in the beginning of this section.

Plummer's *baccharis* is considered a plant species of local concern and is listed on the California Native Plant Society's List 4, which catalogs plants of limited distribution.

The Tidewater goby, a federally-listed endangered species of fish, is known to inhabit the estuarine habitat of the Arroyo Burro Creek. It is a small fish that is endemic to coastal lagoons

in California, where water ranges from brackish to fresh. The species is also a state species of concern, and the California Natural Diversity Database (CNDDB) lists this species as occurring within Arroyo Burro Creek.

The Steelhead trout, recently listed as federally endangered, and as a California species of special concern, historically used the Arroyo Burro Creek watershed. Arroyo Burro Creek has the potential to provide winter steelhead habitat, but there is no documented presence of this species. All south coastal watersheds, including Arroyo Burro Creek, have been defined as Critical Habitat for steelhead, meaning that they are either suitable for steelhead or could be made suitable.

The Southwestern pond turtle, a California species of special concern, lives in riparian and estuarine habitats. It has been historically documented by the CNDDB as occurring within the lagoon of Arroyo Burro Creek. Suitable habitat is present in the lagoon, as well as within the riparian habitat on the Preserve.

The following table lists the special-status species that have the potential to occur on or in the vicinity of the DFP, but have not been recorded on the site and/or do not have designated Critical Habitat at the DFP.

TABLE 4.2-2: Special Status Species That May Occur at the DFP

Scientific Name	Common Name	Legal Status
Plants		
Atriplex coulteri	Coulter's saltbush	CNPS List 1B
Atriplex serenna var. davidsonii	Davidson's saltscale	CNPS List 1B
Thelypteris puberula var. sonorensis	Sonoran maiden fern	CNPS List 2
Animals		
Cneimidophorus tigris multiscutatus	Coastal western whiptail	CSC
Dendroica petechia	Yellow warbler	CSC
Empidonax traillii extimus	Southwestern willow flycatcher	FE
Rana auroa draytonia	California red-legged frog	FT
Riparia riparia	Bank swallow	ST
Ttthamnophis hammondii	Two-striped garter snake	CSC
Ictera virens	Yellow-breasted chat (song bird)	CSC
Accipiter cooperii	Cooper's hawk	CSC
Accipter striatus	Sharp-shinned hawk	CSC
Wilsonia pusilla	Wilson's warbler	CSC

Plant Status Codes: California Native Plant Society (CNPS); List 1B and 2 = rare threatened or endangered. Wildlife Status Codes: ST – State-listed threatened, CSC – California Species of Special Concern, FE – Federal-listed endangered, FT – Federal-listed threatened.

b. Hale Park. Hale Park is a neighborhood park/open space within urban residential development, primarily used by local residents for recreation, walking, hiking, and dog use. The park is predominantly characterized by nonnative annual grassland. Within the nonnative grassland, there are occurrences of seeps (i.e. areas where groundwater seeps to the surface) supporting wetland vegetation. A small seasonal stream and drainage characterized by riparian vegetation traverses the site from the northeast to the southwest corner of the site. Eucalyptus and scattered oaks occur in the eastern portion of the site, and coast live oak woodland with a mixture of ornamentals occurs in the south central portion of the site. Small patches of coastal sage scrub are present in the northwest portion of the site on the north side of the drainage. There are no locally designated historic, landmark, or specimen trees on site. The riparian habitat does not provide a significant wildlife corridor because it is seasonal, has been disturbed, and is not contiguous (i.e., it does not connect other riparian or native plant communities in the vicinity). Figure 4.2-2 presents the locations of the plant communities at Hale Park.

Habitats. The specific habitats or plant communities found at Hale Park are described below.

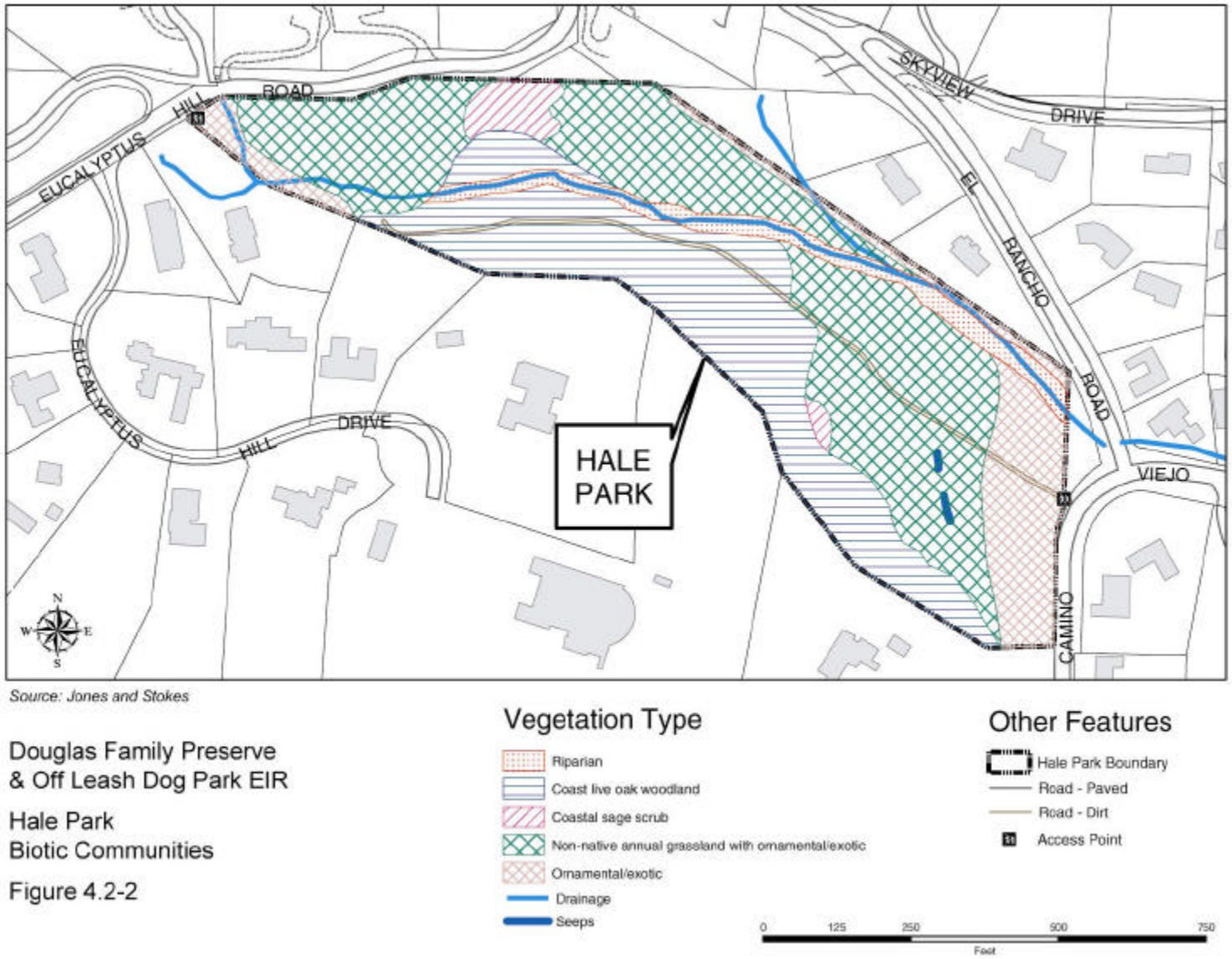
Nonnative Annual Grassland - Nonnative annual grassland is found throughout the site. The nonnative annual grassland provides cover and foraging habitat for a variety of species that also utilize adjacent habitat types.

Coastal Sage Scrub - Coastal sage scrub occurs in a small patch in the northwest portion of the site on the north side of the drainage and again in an even smaller patch located in the southwestern portion of the site. The coastal sage scrub community has been degraded and exhibits low species diversity. This degraded habitat is not extensive and does not support a diverse wildlife population.

Coast Live Oak Woodland - The coast live oak woodland occurs on the south central boundary of the site. The community forms an almost continuous closed-canopy woodland. However, the community is degraded with an invasion of ornamental species. The coast live oak woodland provides nesting sites, cover, and food for a variety of wildlife species. The coast live oak woodland provides important nesting and roosting habitat for raptors.

Riparian - The riparian community is dominated by coast live oak and blue gum. The small seasonal drainage traverses the site from the northeast to the southwest. At the time of the site visits, there was no evidence of flowing or standing water within the creek channel. The riparian habitat provides important food and shelter, including nesting and roosting sites, for many wildlife species.

Ornamentals - The site contains a large number of ornamental species including Australian brush cherry, giant bird of paradise, pittosporum, myporum , and laurel fig. Ornamentals occur throughout the park within almost all of the communities. In addition, blue gum eucalyptus is found throughout the site. The ornamentals and exotics are dominated by tree and shrub species that provide roosting and nesting habitat for bird species and raptors. Small numbers of Monarch butterflies are reported to utilize the


EUCALYPTUS HILL ROAD
SKYVIEW DRIVE
EL RANCHO ROAD
VIEJO CAMINO
EUCALYPTUS HILL DRIVE
HALE PARK
N
W
E
S
Source: Jones and Stokes
Douglas Family Preserve
& Off Leash Dog Park EIR
Hale Park
Biotic Communities
Figure 4.2-2
Vegetation Type
Riparian
Coast live oak woodland
Coastal sage scrub
Non-native annual grassland with ornamental/exotic
Ornamental/exotic
Drainage
Seeps
Other Features
Hale Park Boundary
Road - Paved
Road - Dirt
Access Point
0 125 250 500 750
Feet

eucalyptus trees during their annual migrations, but Hale Park is not considered a roosting site.

Seeps - An area characterized by moist soils and dominated by bulrush is found within the nonnative annual grassland in the southeast portion of Hale Park. This area may be considered an isolated wetland. The seep is small and provides minimal habitat for wildlife species.

Special Status Species. There are no known special status species that occur at Hale Park. However, there is the potential for such species to occur. This section describes the potential presence of special-status species at Hale Park. Special status species are defined in the setting section regarding the DFP above. Special-status plant species that have the potential to occur at Hale Park include:

Sonoran Maiden Fern **-** This CNPS List 2 species is found in meadows, seeps, and streams at elevations of 50–550 meters. This species has not been recorded on the site; however suitable habitat does exist within the riparian and seep habitats. The riparian habitat has been disturbed. Therefore, this species is unlikely to occur on Hale Park.

Special-status animal species that have the potential to occur at Hale Park include:

Cooper's Hawk - This California state species of concern has the potential to occur on the site. Suitable nesting habitat is not present, but roosting habitat is present in the coast live oak woodland habitat and within the eucalyptus trees. The entire site could be used for foraging. It is most likely that this species could occur with uncommon frequency during the fall and winter months.

Sharp-Shinned Hawk – As with the Cooper's Hawk, this state species of concern has the potential to occur on the site. Suitable nesting habitat is not present, but roosting habitat is present in the coast live oak woodland habitat and within the eucalyptus trees. The entire site could be used for foraging. It is most likely that this species could occur occasionally during the fall and winter months.

Monarch Butterfly - The monarch butterfly is not a listed species or species of concern but is generally of local concern; however, this species is biologically rare with restricted distribution and is in decline because of the loss of habitat. The eucalyptus trees at Hale Park provide a minor autumn site for the species; however, the park is not considered a roosting site. It is not considered a major site for this species, and no large concentrations have been documented on the site.

Yellow Warbler - This state species of concern has the potential to use the riparian and coast live oak woodland habitats in Hale Park for foraging on a seasonal basis; however, suitable nesting habitat is not present.

White-Tailed Kite - This California species of concern has the potential to occur on the site. Regional populations of this species have declined.. The eucalyptus trees on site may provide roosting sites, and the entire park could be used for hunting.

Yellow-Breasted Chat – This species has been designated as a California state species of special concern. Suitable habitat is present for this species on the site within the riparian habitat. The status of nesting Yellow-breasted Chats within the area is not known. The riparian habitat has the potential to support seasonal nesting birds.

Warbling Vireo -This local species of concern has not been recorded in the vicinity or on the site. Nesting habitat is not present; however, this species has the potential to use the riparian and coast live oak woodland habitats on a seasonal basis.

Wilson's Warbler - This state species of concern has the potential to use the riparian and coast live oak woodland habitats on the site on a seasonal basis; however, suitable nesting habitat is not present.

c. Shoreline Beach Area. The Shoreline Beach Area lacks vegetation communities except for coastal bluff scrub found on the southern ocean-facing slopes. The remainder of the beach is devoid of vegetation and is characterized by beach sand.

Habitats. The specific habitats found at the Shoreline Beach Area are described below.

Beach - The beach provides foraging habitat for a variety of shore birds and migratory birds, including gulls and sandpipers. Invertebrate marine and terrestrial species also use the beach for protection and foraging. The beach varies in width at any given time, depending on the weather and stage of tide. At low tide, the beach area is estimated to average from 30–40 yards in width. Figure 4.2-3 identifies the boundaries of this area.

Tidal Pools - Tidal pools occur along the shoreline in the intertidal zone below the Douglas Family Preserve and west of Leadbetter beach. The tidal pools provide protection, foraging, and important food sources for a variety of marine invertebrates and fish. Figure 4.2-3 identifies the general location of the tidal pools.

Coastal Bluff Scrub - Coastal bluff scrub occurs in shallow soils on the southern ocean-facing steep slopes of the beach (See Figure 4.2-3).

Special-Status Species. Special status species are defined above under the DFP setting section. Special-status plant species that have the potential to occur in the Shoreline Beach Area include:

Coulter's Saltbush - This CNPS List 1B species occurs in coastal bluff scrub, coastal dunes, coastal scrub, and valley foothill grassland (California Native Plant Society 2001). This species' microhabitat is ocean bluffs, ridgetops, and alkaline low places. Although this species has not been recorded or known to occur in the vicinity of the site, suitable

Source: Jones and Stokes and the City of Santa Barbara

Douglas Family Preserve
& Off Leash Dog Park EIR

Shoreline Beach Area
Biotic Communities

Figure 4.2-3

Features
- Beach Area Boundary
- Coastal Bluff Scrub on South Facing Bluff
- City Park
- Tidal Pool Area
- Road - curb line
- Shore line
- City Boundary
- Access Point

0 500 1,000 2,000 3,000 4,000
Feet

habitat is present; this species could occur within the coastal bluff scrub located on south- and ocean-facing slopes on the site. The species was not observed during site visits.

Davidson's Saltbush – This CNPS List 1B species occurs within coastal bluff scrub and coastal scrub on alkaline soils (California Native Plant Society 2001). The CNDDB reports an occurrence of this species at Arroyo Burro Beach; however, the sighting was in 1947. Suitable habitat is present; this species could occur within the coastal bluff scrub located on south- and ocean-facing slopes on the site. The species was not observed during site visits.

Special-status animal species found, or that have the potential to exist, in the Shoreline Beach Area (SBA) include:

Tidewater Goby - See discussion above under DFP.

Bank Swallow - This state-listed threatened species has been documented at Arroyo Burro Beach; suitable habitat is present on the site within the coastal bluff scrub on south- and ocean-facing slopes.

Western Snowy Plover – This species is federally listed as threatened and as a California state species of special concern. There are no known locations of nesting sites or nests for this species within the Shoreline Beach Area. The USFWS has designated Leadbetter Beach, east of the project site, as critical habitat for this species. There is the potential in the future for the SBA to be designated as Critical Habitat. No western snowy plovers were observed during the site surveys. However, this species could use the beach area for foraging.

Southwestern Pond Turtle - See discussion above under DFP.

Southern California Steelhead – See discussion above under DFP.

California Red-Legged Frog - This species is federally listed as threatened and as a California state species of special concern. This species has not been documented as occurring in the vicinity by the CNDDB. Suitable habitat is present for this species within the lower reaches of Arroyo Burro Creek, which extends into the Shoreline Beach Area, and there is potential for this species to occur.

4.2.2 Policy

The Conservation Element of the General Plan, the Local Coastal Plan (LCP), and the Coastal Act contain several policies pertaining to the protection of habitats of rare and endangered species, environmentally sensitive habitats, and marine (including riparian) resources, as well as maintaining the biological productivity of streams and estuaries. The Conservation Element of the General Plan provides applicable policy that states: "The habitats of rare and endangered species shall be preserved", and "Intertidal and marine resources shall be maintained and enhanced."

The LCP and Coastal Act require the protection of biological resources, including riparian resources, marine resources, and biological productivity. Policies in the LCP require the City to protect, preserve, and where feasible, restore the biotic communities, riparian resources, and maintain biological productivity of the City's Coastal Creeks. Access to the beach is to be kept open to the public. The Local Coastal Plan states:

> *Tidepool resources are most abundant west of Arroyo Burro Beach County Park, along portions of the Wilcox Property, and along Shoreline Park. Generally, intertidal resources in the City's coastal zone exhibit less species diversity than other areas in the County, which makes the City's resources particularly vulnerable to destruction. Tidepool resources are, however, protected from casual collection by the State Fish and Game Code, which prohibits collection of invertebrates without a permit (permits may be issued for scientific, educational and propagation purposes upon the discretion of the Department of Fish and Game). As demand for beach access and recreation increases, the need for protection of tidal resources may become more evident. Proper signing and public education at key locations within beaches and parks may assist in the long-term preservation of these habitats.*

4.2.3 Impact Analysis and Mitigation

a. Significance Thresholds. The following thresholds are used to identify significant biological impacts. These thresholds are derived from the environmental checklist form in the most recent State *CEQA Guidelines* and *City Master Environmental Assessment*. There would be a significant impact if the project were to result in any of the following:

- Have a substantial adverse effect on any riparian habitat, on any species identified as a candidate, sensitive, or special status species or their habitat in local or regional plans, polices or regulations, or by the California Department of Fish and Game, U.S. Fish and Wildlife Service or National Marine Fisheries Service.
- Interfere substantially with the movement of any native resident or migratory wildlife corridors, or impede the use of native wildlife sites.
- Substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife species, or wildlife population, to drop below self-sustaining levels, or reduce the number or restrict the number or range of a rare, threatened, or endangered animal.

- Have a substantial adverse effect on locally designated historic, Landmark or specimen trees.

b. Project Impacts and Mitigation. The following text describes the biological resources impacts for the DFP, Hale Park, and the Shoreline Beach Area.

Impact Bio-1	**The project would destroy animal or plant species identified as a candidate, sensitive, or special status species, or their habitat, or would destroy riparian habitat.**

Douglas Family Preserve Management Plan.

Restoration/Maintenance. The maintenance and restoration efforts identified in the DFP Management Plan are intended to protect and enhance the natural plant communities and wildlife habitat, especially that of special-status species. Restoration would result in a higher quality, less fragmented habitat, including potential for improved wildlife dispersal and migration corridors, resulting in reduced sedimentation in the creek areas, and less competition for native plant species. However, such activities may cause adverse short-term impacts on native plant communities, including special-status plant and wildlife species, especially in the riparian/estuarine communities, and could disturb wildlife nesting and breeding. ***Potentially significant but mitigable*** adverse impacts could result from disturbance during such activities as exotic plant eradication, vegetative fuels management, and bank revegetation. Some of these disturbances would be temporary, and vegetative growth would regenerate naturally. Mitigation measures would be required to minimize disturbance to plant and animal species and to riparian habitat.

Restoration activities could increase soil erosion, as vegetation would be removed that stabilizes the soils, exposing soils to wind and water erosion. Sediment loading is a known cause of riparian and wetland degradation. Sedimentation from restoration activities may cause the filling of these areas, reduce the depth, size and general configuration of deep pools that are necessary to particular species (i.e. steelhead trout, tidewater goby), and carry contaminants to the water environment. Another negative impact to these areas that may be caused by sedimentation is increased water temperatures. As riparian and wetland areas are filled, temperatures may warm due to shallower depths. The tidewater goby and steelhead trout are especially sensitive to increased water temperatures, and the goby's reproduction is dependent on coarse sand bottoms. Sedimentation can change the bed textures. Steelhead trout reproduction is dependent on deep pools, and sedimentation may cause reduction of pool depths. The DFPMP's policies consist of measures to offset potential impacts, including avoiding sensitive plants and native plant communities, working outside of the wildlife breeding seasons, surveying for and avoiding nests, reducing the spread of invasive exotic plants, replanting with native plant species collected on site or from nearby Santa Barbara coastal locations, erosion control, removing exotic natives in a mosaic pattern, and other measures. The impacts would be ***potentially significant, mitigable*** for sensitive species of flora and fauna and sensitive habitats. Mitigation measures are required in Section 4.6 WATER RESOURCES to ensure that the initial restoration efforts and the ongoing maintenance of the DFP are conducted appropriately and that erosion is minimized. Mitigation measures Water-1 through Water-4 would also apply here. (Also see the discussion of "Dog

Use" below.) These mitigation measures limit the timing of revegetation in and near Arroyo Burro Creek, require use of erosion control devices during establishment of vegetation, and Best Management Practices (BMPs) to control erosion during revegetation, monitoring, prompt revegetation, and disturbing the minimum area necessary for exotic invasive species removal.

Herbicides. Rodeo, an herbicide that is certified aquatic safe, may be used to control non-native invasive plant species found in the area of Arroyo Burro Creek and the unnamed tributary as a part of the restoration efforts. Roundup, for control of non-native invasive terrestrial plant species, more than likely would be used to remove the poison oak from around the existing fire hydrants on the mesa portion of the property. It may also be used to control invasive species elsewhere on the property including creek banks in the vicinity of Cliff Drive. The project includes provisions that would require hand spraying of these herbicides, which helps to ensure that the herbicide is placed where it is needed and thereby minimizes the amount of chemical used and areas where the chemical is distributed. If these products are not used properly, they have the potential to result in loss (temporary or permanent) or potential damage to habitat, native flora and fauna, and special-status plants and animals and their habitats. Use of these products may have ***potentially significant, mitigable*** impacts. MM Water-9 and Safety-1 are also required here. Mitigation measure Water-9 requires licensed supervision of the use of herbicides, preferential use of mechanical removal, and compliance with existing laws and manufacturers' instructions. Only licensed applicators would be allowed to use these materials on the property. Mitigation measure Safety–1 stipulates that such chemicals shall be applied only under certain conditions, and identifies measures to minimize exposure to personnel applying the chemicals.

Structures. A caretaker's residence, public toilet and associated underground utilities could be constructed on the project site. The precise locations of these facilities are not yet known, but the toilet and residence could be located near the Medcliff Road and Borton Road entrances, more than 25 feet from the bluff edge. Mitigation measure Geo-1 requires any structure to be placed outside of the 75-year setback, which is currently 40 feet or greater from the edge of the bluff edge. There is the potential for these facilities to be located near trees, and this issue is addressed below under Impact 4.2.2. The proposed residence and public toilet impacts on special status species animals and plants, and on riparian habitat, would be ***less than significant*** because there are no such species in the area that would be impacted.

Other Minor Structures. There are currently regulatory signs at entrances to the DFP, along with mutt mitt stations. Backless benches, trash receptacles, signage (including a comprehensive interpretive sign program and regulatory signs) and "mutt mitt" stations would be allowed on the property. The precise locations of some of these facilities are not yet known. Most of the signage and mutt mitt stations would be located at park entrances and at the top of the Oak Grove Trail. Vegetation in these locations is generally ornamental in nature and would not be adversely affected by signs and stations. However, there would be ***potentially significant, mitigable*** impacts if the benches, trash receptacles and other minor structures were placed within sensitive habitats. Mitigation measures have been identified to avoid this impact.

Douglas Family Preserve Dog Use.

A. Dogs off-leash all the time.

Mesa Top. Off-leash dog use is limited to the mesa top of the DFP, both currently and as stipulated in the DFPMP. Dogs are required to be on-leash on the Oak Grove Trail both currently and under the DFPMP. The mesa top has been degraded by disturbance, and has a lower plant and animal species diversity than do the slopes surrounding the site. Several species of concern, including birds, may utilize the mesa for foraging, and the eucalyptus and Monterey pines along the southern border of the mesa for shelter. Dogs could create potential impacts on biota by chasing, biting, barking, scaring, digging, and by defecating or urinating on sensitive areas. However, the potential increase in dog activity in all alternatives would not be expected to substantially degrade their habitat or significantly affect those species' ability to forage. Suitable habitat for special-status plant species is not found on the mesa top. Therefore, project impacts on special status species on the mesa top would be ***less than significant.***

Other Habitats. Increased dog activity allowed by Alternative A could affect: 1) sensitive estuarine and riparian habitats supporting the southern California steelhead and tidewater goby; and 2) coast live oak woodland and coastal bluff scrub habitats that have the potential to support special-status plant species. While dogs do not routinely use these areas or other sensitive habitats because steep slopes and vegetation reduce access, there is still the potential for increased dog use in the area because some vegetation has been removed. As proposed in the DFP Management Plan, dogs and humans would be prohibited at all times from the sensitive riparian, estuarine, coast live oak woodland, and coastal bluff scrub habitats. The Plan calls for educational signage at the entrances or elsewhere at the DFP to discourage dog entry into riparian, oak woodland, and coastal bluff scrub areas, with the exception of the Oak Grove Trail, where dogs are allowed on-leash. A policy added to the DFP Management Plan requires daily pick-up of dog feces and daily enforcement patrols to keep dogs out of sensitive areas. Because increased off-leash dog use could impact estuarine, riparian, coast live oak woodland, coastal bluff scrub, and the above-noted DFP policies are insufficient, impacts on habitat and special status species within them would be ***potentially significant, but mitigable***. As noted in Section 2.0 PROJECT DESCRIPTION, a policy has been added to the DFP Management Plan requiring the planting of native vegetation along the base of the Oak Grove Trail to strongly discourage access by dogs and people to the creek area. This would effectively reduce access to the riparian corridor. MM Water-7, which states that vegetation that would discourage human and dog access to this area shall be planted, is also required here to further protect biological resources.

Disease. Parvo is a disease that only affects canines. It is transmitted by the feces of infected dogs. Usually, dogs under six months old contract the disease and they may die from it. The park is already used by dogs, and so it is likely that any canines that frequent the area have already been exposed to Parvo. Since the City regulations already require dogs to be vaccinated, the area has already been exposed to dogs, dogs under four months old are not permitted in the parks, and there are no sensitive canine species expected in the project area, this impact would be

less than significant. This Parvo analysis apples to all dog use alternatives on all of the three sites.

Other Projects. The City is considering another separate project (Arroyo Burro Estuary restoration) that would restore the estuary and could modify the creek banks at the DFP. This separate project will be subject to separate environmental review. If the separate creek restoration project is approved and it authorizes the laying back of the creek bank, access would be increased for all dogs and especially off-leash dogs. This improved access would be from the base of the Oak Grove Trail and from the creek itself, near the Cliff Drive bridge. Increased dog access to the area would result in plant trampling and dogs digging, which could damage the restored creek bank plant materials, increasing erosion of the soils by exposing them to forces of wind and water. The creek bank restoration would utilize erosion control mats, monitoring to ensure that vegetation is being reestablished, and revegetation/mat replacement where soils are exposed. Although access to the area around the creek could be improved by bank modifications of the Arroyo Burro Estuary project, it would still not be easy for dogs or humans to access the revegetated bank since access to this area would be retarded by the proposed vegetative barrier at the base of the Oak Grove Trail. (See also mitigation measure Safety-2). As noted above, off-leash dog use is only allowed on the mesa top at the DFP, and so off-leash dogs are not permitted at the base of, and along, the Oak Grove Trail. Creek bank modifications would result in ***less than significant impacts*** on the special species inhabiting the Arroyo Burro Creek and the adjacent riparian area. Increased enforcement of off-leash laws and implementing proposed vegetative barriers to reduce access from Cliff Drive and the base of the Oak Grove Trail are measures recommended to minimize this impact.

B. Other Dog Use Alternatives.

All of the other off-leash dog use alternatives on the site would have sensitive species impacts considered ***potentially significant, mitigable*** and ***less than significant*** (depending on the issue area) for the reasons described above for Alternative A, and the same MM Water-7 would be required. The greatest impacts would be associated with alternatives that maximize the amount of time that off-leash dogs are allowed at the DFP. Both on- and off-leash dogs have the potential to cause an impact, but off-leash dogs may have a greater potential since owners commonly have less physical control over dogs off-leash. Therefore, Alternative A (dogs off-leash all the time) would have the greatest impacts followed by Alternative E (dogs on-leash 2 days and off-leash 5 days), D (dogs prohibited 2 days a week and allowed off-leash five days), a tie for F (dogs allowed on-leash on odd numbered days of the month and otherwise off-leash), and C (dogs on-leash every day between 10 AM and 3 PM otherwise off-leash), and then the least impacts associated with Alternative B (dogs always on-leash). Alternative B would result in ***less than significant*** impacts, and mitigation measure Water-7 is recommended.

Hale Park Dog Use.

A. Dogs off-leash all the time.

Riparian Area. Off-leash dog use is already occurring at Hale Park, even though it is prohibited. This off-leash dog use has not resulted in significant impacts to area habitats. It is anticipated that publicizing approval of Hale Park as an off-leash dog park could result in a

substantial increase in dog use at Hale Park. The increased use of Hale Park as an off-leash dog park would increase the amount of trampling of sensitive vegetation and harassment or injury of wildlife, and sensitive biological communities especially at the riparian area and at the seeps, resulting in ***potentially significant, mitigable*** impacts. There are no special status species that were observed at Hale Park, and so no substantial impacts on special status species are anticipated. Mitigation measures are required to reduce access to the sensitive areas using a vegetative barrier, or to create a fenced off-leash dog park pursuant to MM Safety-6, and signs to indicate the area contains sensitive species and that people and dogs are forbidden from entering the area, as well as patrol of the area to ensure there is no access.

B. Other Dog Use Alternatives.

All of the off-leash dog use alternatives could result in impacts to sensitive habitat and species that are ***potentially significant, mitigable*** for the same reasons described above for Alternative A. Alternative C (dogs off-leash for limited times every day), would result in a smaller amount of potential conflict between dogs and biological resources than Alternative A (dogs off-leash all the time), and Alternatives E (dogs allowed on-leash two days a week otherwise off-leash) and Alternative D (dogs prohibited two days a week otherwise off-leash), because the amount of time that the sensitive biological resources would be exposed to off-leash dogs would be less. Alternative C (dogs on-leash every day during specified times) and Alternative F (dogs allowed off-leash on odd numbered days of the month) would result in similar levels of impacts because the amount of time that the sensitive biological resources would be exposed to off-leash dogs would be similar. Mitigation measures are required to install a barrier around the creek and the seep area, or to implement MM Safety-6, to reduce impacts on riparian vegetation adjacent to the creek, as well as to install signs to prevent access, and to patrol the area to ensure people and dogs are not entering the area.

Alternative B (dogs on-leash all the time), would result in the least amount of potential conflict between dogs and sensitive biological resources of all the alternatives, since dogs would be restrained at all times of the day and would therefore not be able to enter sensitive areas of the site and harass wildlife unless accompanied by their owners. Alternative B would result in impacts that are ***less than significant***.

Shoreline Beach Area Dog Use.

A. Dogs off-leash all the time.

Snowy plover. Dogs off-leash all the time could potentially result in impacts on the federally threatened western snowy plover, which may be present over-wintering and foraging on the beach. Per the USFWS Draft Recovery Plan, the nearest critical habitat for the snowy plover is Leadbetter Beach, adjacent to the project on the east. The SBA could be or become western snowy plover winter foraging habitat, and increased off-leash dog use could diminish the ability for the birds to forage in the area. Dogs off-leash could chase the snowy plover, reducing feeding time. The presence or absence of western snowy plovers along this beach is yet to be confirmed. If they are present, there may be a significant impact on this bird if increased off-leash dog use is allowed. A conservative approach is taken in this EIR, and it is assumed that the

birds may be present foraging for at least a part of the year. The more time that dogs are off-leash, the greater the potential impact on the western snowy plover because this impact is related to the amount of time the off-leash dogs are able to chase the birds and the amount of time the birds may be prevented from foraging. Therefore, it is concluded that the project would have a ***potentially significant, but mitigable*** impact on the western snowy plover and its habitat. Mitigation measures would require dogs to be on-leash during snowy plover foraging activities in the Shoreline Beach Area, and enforcement of leash laws would be increased. Discussions with the US Fish & Wildlife Service indicate that this mitigation measure would be appropriate (personal communication, Katie Drexage, US Fish & Wildlife Service, February 18, 2003).

If the City decides to approve off-leash dog use in the SBA during snowy plover foraging season, and not implement MM Bio-16 (which restricts off-leash dog use at the SBA for part of the year), there would be an unavoidably significant impact since the snowy plover is a listed species protected by the USFSWS. If the City decides to approve this activity, a species specific survey for the presence of the snowy plover would be necessary and, if found to be present, a take permit (pursuant to Section 9 of the Endangered Species Act) may be required from the USFWS.

Tide Pools and Arroyo Burro Creek. Increased unrestricted dog and/or related dog owner activities could result in significant impacts on tide pool resources below the DFP and to the east of Shoreline Park stairs, and could potentially have adverse effects on marine and aquatic species, including special status species in the lower reaches of Arroyo Burro Creek. Dogs could trample and dig in these sensitive areas, destroying vegetation and harming tide pool faunal species. Off-leash dog impacts on tidal pools and in Arroyo Burro Creek would tend to increase with the amount of time that these sensitive biological resources are exposed to off-leash dog activities. These impacts are ***potentially significant but mitigable***. The only mitigation measures available to reduce this impact to a less than significant level would be to require dogs to be on-leash at all times in the area. Dogs would be allowed off-leash between the Mesa Lane teps and the Shoreline Park stairs (Figure 4.2-4). Additional patrols to increase enforcement of dog leash laws, and picking up pet fecal matter would also be required.

Source: Jones and Stokes and the City of Santa Barbara

Douglas Family Preserve
& Off Leash Dog Park EIR

Shoreline Beach Area
Off Leash Dog Use Area

Figure 4.2-4

Features
- Beach Area Boundary
- Off-Leash Dog Use Area
- City Park
- Tidal Pool Area
- Road - curb line
- Shore line
- City Boundary
- Access Point

0 500 1,000 2,000 3,000 4,000
Feet

B. Other Dog Use Alternatives

All of the other off-leash dog use alternatives on the site would have ***potentially significant, but mitigable*** impacts on the snowy plover and on tide pool habitat for the same reasons as for Alternative A, above. The greatest impacts would be associated with alternatives that maximize the amount of time that off-leash dogs are allowed in the Shoreline Beach Area. Therefore, Alternative A (dogs off-leash all the time) would have the greatest impacts followed by Alternative E (dogs on-leash 2 days and off-leash 5 days), D (dogs prohibited 2 days a week and allowed off-leash five days), a tie for Alternatives F (dogs allowed on-leash on odd numbered days of the month and otherwise off-leash) and C (dogs on-leash every day between 10 AM and 3 PM otherwise off-leash), and then the least impacts associated with Alternative B (dogs always on-leash). Adverse impacts of Alternative B (dogs always on-leash) on tide pools and sensitive species in Arroyo Burro Creek would be ***less than significant***.

Mitigation Measures. The following mitigation measures are **required** for the DFPMP. Mitigation measures Water-1 through Water –5, Water-9, Safety-1 and Safety-2 are also required to mitigate biological resource impacts. These measures protect biological resources from erosion and ensure safe application of herbicides, as well as provide monitoring to assure compliance with dog use requirements, which would protect biological resources. Mitigation measures Bio-16, -17, and -18 protect trees from potential development under tree drip lines (see further below), and are also required.

MM Bio-1 **Prior to vegetation removal for maintenance or construction, a qualified biologist shall temporarily relocate any special status wildlife species, and mark and avoid or transplant sensitive flora and fauna found in or near the proposed work area. Shrubs and trees with nesting birds shall be avoided until the nestlings are fledged. Breeding seasons for sensitive fauna (generally April through September) shall be avoided unless a qualified biologist conducts a clearance survey that indicates there are no special status species present in the area of proposed maintenance or construction.**

MM Bio-2 **Following vegetation removal and ground disturbing activities, seed and plant disturbed areas with native vegetation or with vegetation required by the restoration plan immediately.**

MM Bio-3 **If it is necessary to disturb the banks of Arroyo Burro Creek within the estuary to carry out habitat restoration, the following measures shall be implemented to reduce impacts to sensitive species, including the Tidewater goby, to less than significant levels:**

- **New vegetation placed on the Arroyo Burro Creek bank tops shall be of such size and type so as to continue to discourage dog access into the creek or tributary.**

- **No construction work shall be scheduled in the water anywhere in the estuary during the main rainy season, from November 1st through April 1st, because rains could cause erosion.**

- **A temporary construction enclosure shall be created around the bank area to be restored. All parts of the barrier shall be made of impermeable materials or other type acceptable to the California Department of Fish and Game. The first barrier piece installed shall be on the edge of the creek, parallel to the bank to be restored.**

- **A qualified restoration ecologist or landscape specialist shall monitor the enclosure at least twice weekly, and any adjustments necessary shall be implemented.**

MM Bio-4 **To the extent feasible, exotic plant eradication activities shall occur in a mosaic pattern or in small areas that preserve enough vegetation to provide diverse habitats.**

MM Bio-5 **Use of herbicides on the DFP shall be subject to approval by the Parks and Recreation Director, or designee. Mechanical vegetation methods shall be provided preference except where herbicides are the only feasible means of exotic invasive species control. Hand spraying or wicking shall be used. All spraying shall take place when rain is not predicted within six hours and shall comply with existing regulations and manufacturers instructions. Herbicides shall be applied selectively, only to specific problem vegetation. Invasive weeds shall be reduced by selective spraying and hand-removal of propagules. Trained personnel shall do all hand work and spraying. Sprayers shall be filled outside of the sensitive management units.**

MM Bio-6 **A restoration plan, including performance criteria, a summary of the maintenance and monitoring requirements, as well as copies of any agency permits or approvals and special conditions shall be submitted to the City Environmental Analyst for approval prior to implementation.**

MM Bio-7 **Plants used in the restoration plans shall be propagated from the project site or within coastal Santa Barbara County, as approved**

by a qualified restoration ecologist or landscape specialist . It is preferable to use smaller propagules for establishment of habitat such as liners, cuttings, or one-gallon containers.

MM Bio-8 **A two-year initial establishment and maintenance period shall begin immediately after the implementation of the restoration. To receive final acceptance of the restoration by the City's Environmental Analyst, the site(s) shall be inspected and approved by a qualified restoration specialist/landscape specialist involved in the design and/or implementation of the restoration plan. During the two year maintenance period following initial restoration:**

- **Routine activities shall be conducted to maintain the plantings and seeded areas in a healthy condition and control erosion of the site. Maintenance activities shall include routine watering or irrigation inspection, replanting or reseeding, repair of damaged areas, weeding, remedial erosion control and removal of excess sediment from areas if the sediment has clearly eroded from the mitigation site.**

- **The site(s) shall be inspected by a qualified restoration specialist/landscape specialist for necessary repair or remedial measures a minimum of four times a year.**

- **At the end of the maintenance period, the restoration specialist/biologist shall conduct a final inspection. Any outstanding items will need to be completed prior to final approval and acceptance of the restoration.**

- **Semi-annual reports in April and November on the status of the restoration work shall be submitted to the Environmental Analyst, including the following information:**

    - **A quantitative analysis of attainment of annual performance standards and progress toward meeting final performance standards and discussion of any issues or problems and how they have been resolved.**

    - **A list of names, titles and affiliations of person(s) implementing restoration and person(s) conducting the monitoring and preparing the report.**

- **Photographs taken at photo-documentation points.**
- **Relevant maps.**
-

MM Bio-9 **A five-year monitoring period shall follow the two-year maintenance program that includes:**

- **Use of a standard vegetation sampling method.**
- **Plant species composition and percentages shall be determined for the mitigation site by sampling throughout the site and recording relevant data, such as:**
  - **Species occurring within the area, the species wetland or riparian indicator status and whether the species is native or introduced.**
  - **Percent plant cover.**
- **Additional weeding shall be required if necessary to meet the performance goals for plant cover and species diversity.**

MM Bio-10 **Annual reports describing the results of mitigation monitoring shall be submitted to the Environmental Analyst and other interested agencies before the end of each November for the three years following the two year monitoring for initial establishment and maintenance. The annual monitoring reports shall contain the following information:**

- **A quantitative analysis of attainment of annual performance standards and progress toward meeting final performance standards.**
- **Qualitative information about weather and site conditions shall be collected.**
- **A list of names, titles and affiliations of persons conducting the monitoring and preparing the report.**
- **Color photographs taken at established and permanent photo-documentation points.**
- **Relevant maps.**
- **Summary results of previous years' monitoring.**

Mitigation measure Water-7, which requires a dense vegetative barrier to prevent access to the biologically sensitive riparian area, is **required** for Alternatives A and C-F, and recommended for Alternative B, at the DFP. (Water-7 is also a recommended mitigation measure for the DFP in Section 4.6 WATER RESOURCES).

Mitigation measures Safety-2, Water-10 and either MM Safety-6 *OR* the following mitigation measures are **required** for Alternatives A and C-F at Hale Park. MM Water-10 requires a barrier of 25 feet from centerline of the drainage. MM Safety-2 requires daily monitoring to ensure compliance with dog use regulations to protect biological resources. MM Safety-6 requires off-leash dogs to be within a fenced area and would limit off-leash dog incursions into biologically sensitive areas.

MM Bio-11 **Aesthetically appropriate signs shall be installed to inform the public that access to the coast live oak woodland, riparian area, and the small hillside seeps is restricted to protect special status species. The signs shall be approved by the City Sign Committee and other appropriate review body.**

MM Bio-12 **An aesthetically pleasing barrier(s) shall be constructed to prevent dog access to the small seeps located in the hilly grassland area toward the eastern portion of the site.**

The following measures are **required** for Alternatives A and C-F at the Shoreline Beach Area, as well as MM Safety-2, which provides guidelines for off-leash dog use.

MM Bio-13 **Dogs shall remain on-leash at all times in the Shoreline Beach Area except between the Mesa Lane Steps and the Shoreline Park stairs and the SBA west of Arroyo Burro County Park.**

MM Bio-14 **Dogs shall remain on-leash in the Shoreline Beach Area during the winter snowy plover foraging period from November 1 to March 1.**

MM Bio-15 **Aesthetically appropriate signs shall be installed that inform the public about the sensitive nature of Arroyo Burro Creek and the tide pools. The signs shall indicate that these areas are being protected due to the occurrence of special status species and that dogs are not allowed in this area. The signs shall be approved by the City Sign Committee or other appropriate review body.**

Residual Impacts. With the inclusion of the required mitigation measures, impacts to biological resources would be reduced to **less than significant** levels for the DFPMP and for all alternatives at Hale Park, SBA, and the DFP. Off-leash dog use in the Shoreline Beach Area would require mitigation to ensure that off-leash dogs are not near the tidepools, and to not allow off-leash dog use in the Shoreline Beach Area from November until March when snowy plovers may forage on the shoreline. If dogs are allowed off-leash on the entire Shoreline Beach Area, the impacts on tidal pools and Arroyo Burro Creek would be significant and unavoidable. Since complete compliance and enforcement of dog-related regulations called for in the mitigation measures are not feasible, there remains the potential for dog-related impacts upon

implementation of the proposed mitigation measures. However, the remaining impacts would be less than significant. Some of the proposed mitigation measures would require additional staff enforcement and volunteer efforts. A determination of the feasibility of implementing these mitigation measures will ultimately be made by City Council. If the measures are found to be infeasible, impacts would be unavoidably significant.

Impact Bio-2	**The project would potentially remove or otherwise impact non-native plants and trees.**

Douglas Family Preserve Management Plan.

Trail Improvements. At present, maintenance of the trails consists of minor activities, such as filling large ruts on the trails. Some trails need additional minor improvements. The slope and surface of the main loop trail would be improved sufficiently to allow wheelchair access to the DFP and improve drainage. However, to maintain the present ambience of the DFP, existing puddle and pond areas in the middle of the trail would not be improved. Instead, existing informal access around such areas would be formalized. Where necessary, the main and middle loop trails would be regraded to minimize the cross-pitch or slope. Some potholes would be filled to smooth the trail to maintain universal access. These informal access areas are not vegetated for the most part, with the exception of some ruderal (non-native grass) species. Concerns have been expressed about the potential impacts of the Oak Grove Trail on the surrounding oak trees. The DFP Management Plan calls for no changes to the trail, which has existed for many years with minimal effects on oak trees, unless future erosion requires improvements to minimize the erosion. Impacts to biological resources would be ***less than significant.***

Fire Safety Management. Currently, vegetative fuels trimming is done periodically at the site. The Plan calls for 7 ½-foot buffers on either side of the main loop and middle loop trails, and a 60-foot wide buffer adjacent to residential areas along the easterly property line. The Plan indicates that these buffer areas would be mowed and trimmed to reduce fire hazards. Vegetation would not be cleared, but would be thinned in a "mosaic pattern" to retain habitat value. Prior to carrying out these activities, native forbs, shrubs and trees that could be damaged by the mower would be tagged to increase their visibility so they could be avoided. In addition, a weed whip would be used to remove other plants within a three-foot radius of tagged vegetation. Finally, the City arborist or a designated representative would be on-site and would be authorized to stop work to make sure that native plants are protected Another policy requires that tree trimming not occur during the nesting season of birds. Therefore, impacts to sensitive biological resources due to vegetation management for fire hazard reduction would be ***less than significant***. (See also discussion under herbicides above and in Section 4.6 WATER RESOURCES)

Trail Removal. Several unauthorized trails are proposed for removal. Access to such trails would be blocked off and a revegetation program would be carried out. The type of revegetation would depend on the trail location. The areas would either be reseeded or planted with native vegetation that carries out the goals of the DFP Management Plan. ***Beneficial***

impacts to biological resources are expected to occur due to this trail removal because access to areas where sensitive biological resources occur would be reduced.

Caretaker's Residence and Restroom Facility. A caretaker's residence is being considered for construction near the present location of the caretaker's trailer at the Medcliff Road entrance. A restroom is proposed for construction at either the Medcliff Road or Borton Drive entrances. It is possible that placement of the caretaker's residence, with required foundations, at the Medcliff Road location now occupied by the caretaker's trailer, would result in impacts on the root system of the eucalyptus grove. However, the Plan is not explicit about where, at the Medcliff Road entrance, the residence could be placed, other than requiring it to be at least 25 feet from the top of the bluff. (Note that in Section 4.3 Geophysical, the residence would be required to be at least 40 feet from the top of bluff). It could be located north of the existing entrance trail in an area that consists of a combination of ruderal and coastal sage scrub habitat (the immediate area is mostly ruderal in vegetation). Since the precise location of the residence and restroom is not yet known, there could be damage to existing eucalyptus trees if the structures were sited within the tree driplines. Construction of the residence and restroom could also result in the relocation of existing trails, which also may interfere with tree driplines. Depending on where the restroom is placed at the Borton Drive site, there could be impacts on trees in the area. Therefore, impacts to non-native trees are considered ***potentially significant but mitigable*.** Mitigation measure are required that prohibit construction within the dripline of trees.

Other Minor Structures. Backless benches, trash receptacles, signage (including a comprehensive interpretive sign program and regulatory signs) and "mutt mitt" stations would be allowed on the property. The precise locations of some of these facilities are not yet known. Most of the signage and mutt mitt stations would be located at park entrances and at the top of the Oak Grove Trail. Vegetation in these locations is generally ornamental in nature and would not be adversely affected by signs and mutt-mitt stations. However, there would be ***potentially significant, but mitigable*** impacts if the benches, trash receptacles and other minor structures were placed within the driplines of native trees. Required mitigation would prohibit construction within the driplines of trees.

Douglas Family Preserve Dog Use.

A. Dogs off-leash all the time.

Off-leash dog use is already occurring on the site and does not appear to have damaged non-native vegetation. Increased off-leash dog use is similarly not expected to result in a significant decline in the number or health of non-native trees and vegetation. Therefore, impacts would be ***less than significant***. Alternative A (dogs off-leash all the time) would have the greatest impact on non-native vegetation because this use would be expected to intensify and off-leash dogs are expected to trample and dig in it with the greatest level of freedom. However, none of the dog use alternatives would have significant impacts on non-native vegetation.

B. Other Dog Use Alternatives.

All of the other alternative dog use scenarios could result in similar minor impacts on non-native vegetation, including trees, and impacts would be ***less than significant***. Off-leash and on-leash dog use are already occurring and have not resulted in substantial degradation of the non-native vegetation and trees on the site. Increased dog use under Alternatives C through F is not expected to increase impacts on non-native species, including trees. Alternative B (dogs on-leash all the time) would have less impact than the other dog use scenarios on non-native vegetation because dogs would be under greater physical owner control.

Hale Park Dog Use.

A. All Dog Use Alternatives.

All alternatives would have ***less than significant*** impacts on non-native plants and trees. Increased off-leash dog use could result in the destruction of some non-native grasses currently located in the park due to dogs trampling, digging, and dog feces not removed. While the impact on the grass itself would be less than significant, the grass currently minimizes sediments from entering the creek during the rainy season. Alternative B (dogs on-leash) would have the least impact on the non-native vegetation that currently holds site soils in place because the dogs would be under the greatest level of owner control, reducing the dogs' ability to dig and ensuring owners are aware their dogs have defecated. This erosion impact and associated mitigation measures are discussed in section 4.6 WATER RESOURCES.

Shoreline Beach Area Dog Use.

A. All Dog Use Alternatives.

No non-native vegetation occurs in this area. Since no non-native vegetation occurs in this area, ***no impacts*** were identified on the Shoreline Beach Area related to non-native vegetation destruction for all dog use alternatives.

Mitigation Measures. The following measures are **required** for the DFPMP to protect trees from potential development under tree drip lines. No mitigation measures are required for Hale Park (beyond water resource measures) or the Shoreline Beach Area, or for dog use activities at the DFP.

MM Bio-16 **The caretaker's residence and/or restroom shall be placed outside the dripline for all trees. No construction equipment, storage or wastewater disposal shall be permitted within the driplines of trees.**

MM Bio-17 **If it is necessary to relocate trails in order to construct the caretaker's residence and restroom, the trail relocation(s) shall be designed to avoid any ground disturbance within the dripline of all trees.**

MM Bio-18 **All minor structures, including but not limited to benches, trash receptacles, signs and mutt mitt stations shall be located outside the driplines of any native trees. No such structures shall be located in a sensitive habitat area. Such structures to be located at the edges of such a habitat shall be placed based on a recommendation from a qualified restoration ecologist or landscape specialist.**

Residual Impacts. Upon implementation of the above mitigation measures for the DFPMP, impacts would be reduced to a **less than significant** level.

Impact Bio-3	**The proposed project could potentially affect wildlife dispersal or migration corridors.**

Douglas Family Preserve Management Plan.

The DFPMP proposes to maintain the majority of existing vegetation on the site except for exotic invasive species. None of the proposed project elements would be expected to reduce wildlife habitat or create barriers to migration of any species. Proposed revegetation would improve habitat on the project site which can then be used as a wildlife corridor and facilitate dispersion and use of the site, particularly along the riparian corridor, resulting in a ***beneficial*** impact.

Douglas Family Preserve Dog Use.

A. All Dog Use Alternatives.

The DFP is currently a public park and is used for off-leash dog use; current use has reduced the amount of habitat available for wildlife and reduced the role the site plays as a wildlife migration corridor. An increase in dog use would be unlikely to result in substantial further reduction of wildlife habitat or site use as a wildlife corridor. No new barriers to wildlife migration would be created. Therefore, dog use alternatives would result in impacts on wildlife dispersion and corridors that are ***less than significant***. This less than significant impact would be reduced by proposed beneficial revegetation proposed as a part of the DFPMP that would improve the wildlife corridor and provide improved habitat as discussed above.

If a fence were installed for off-leash dogs, as mitigation for safety related impacts, this would encompass a 3-4 acre area on the bluff top. This site is sufficiently large to provide alternative routes around the fenced area, and so wildlife migration corridors would still exist and project impacts would be ***less than significant***. In fact, by confining off-leash dogs to the fenced area, there would be a ***beneficial*** impact due to a reduction in wildlife harassment and other incursions into sensitive habitat areas.

Hale Park Dog Use.

A. Dogs off- leash all the time.

Hale Park is currently a public park and is used for on and off-leash dog use; current use has reduced the amount of habitat available for wildlife and reduced the role the site plays as a wildlife migration corridor. An increase in dog use could result in further reduction of wildlife habitat in the riparian area along the creek and seep area and site use as a wildlife corridor. However, there is no evidence that the site is currently used as a major wildlife corridor for any sensitive species. Therefore, potential impacts on wildlife dispersion and corridors from dog-use alternatives would be ***less than significant***.

B. Other Dog Use Alternatives.

All of the other dog use alternatives on the site would have impacts on habitat and wildlife corridors that are ***less than significant*** for the reasons noted above for Alternative A. The greatest impacts would be associated with alternatives that maximize the amount of time that off-leash dogs are allowed in Hale Park because the dogs would have increased opportunities to harass wildlife using the site as a migration corridor. No special status species are known to use the DFP as a wildlife corridor, but the creek areas are most likely used as wildlife corridors. Therefore, Alternative A (dogs off-leash all the time) would have the greatest impacts followed by Alternative E (dogs on-leash 2 days and off-leash 5 days), D (dogs prohibited 2 days a week and allowed off-leash five days), a tie for F (dogs allowed on-leash on odd numbered days of the month and otherwise off-leash) and C (dogs on-leash every day between 10 AM and 3 PM otherwise off-leash), and then the least impacts associated with Alternative B (dogs always on-leash).

Shoreline Beach Area Dog Use.

A. Dogs off-leash all the time.

Off- and on-leash dog use at the Shoreline Beach Area is already occurring and fishermen, people walking, and surfers also use the beach for recreation. On-leash dog use has been observed to be a small portion of dog use in the area. This dog use has already diminished the role that the site may have played as habitat, and as a wildlife migration corridor. Further increases in dog use, especially off-leash, would be unlikely to substantially decrease the role that the site plays as habitat, and as a wildlife migration corridor. Therefore, Alternative A (dogs off-leash all the time) would be unlikely to have a significant impact on Shoreline Beach as a wildlife dispersion area and as a wildlife migration corridor. Alternative A would therefore result in impacts on wildlife dispersion and corridors that are ***less than significant.***

B. Other Dog Use Alternatives.

All of the other dog use alternatives on the site would have impacts on habitat and wildlife corridors that are ***less than significant***. The greatest impacts would be associated with alternatives that maximize the amount of time that off-leash dogs are allowed on Shoreline

Beach. Therefore, Alternative A(dogs off-leash all the time) would have the greatest impacts followed by Alternative E (dogs on-leash 2 days and off-leash 5 days), D (dogs prohibited 2 days a week and allowed off-leash five days), a tie for F (dogs allowed on-leash on odd numbered days of the month and other wise off-leash) and C (dogs on-leash every day between 10 AM and 3 PM otherwise off-leash), and then the least impacts associated with Alternative B (dogs always on-leash).

Mitigation Measures. No mitigation measures are required.

Residual Impacts. Residual impacts would be **less than significant**.

c. Policy Consistency. One of the objectives of the DFP Management Plan is to protect and enhance biological habitats. Since the DFP Management Plan calls for habitat restoration and maintenance, and only minor improvements to facilitate ongoing use, and the policies aim to protect and improve biological resources, the Management Plan would be potentially consistent with the relevant policies of the Conservation Element of the General Plan, Coastal Act, and Local Coastal Program. The habitat restoration and maintenance activities and the proposed development (signs, benches, the caretaker's residence, restroom, etc.) may result in incidental impacts to biological resources, and so identified mitigation measures are necessary to reduce impacts and ensure consistency with the relevant policies.

Dog use of the DFP and the Shoreline Beach Area is consistent with the balanced use provisions of the Local Coastal Plan, Coastal Act, and the Conservation Element. Off-leash dog use impacts in the Shoreline Beach Area could impact intertidal resources, and so off-leash dog use would be potentially inconsistent with the policy that protects the intertidal and marine resources. Since this policy inconsistency could lead to a significant impact on the shoreline resources, this impact would be ***potentially significant***. Mitigation measures are required to keep dogs on-leash in the vicinity of the tidal pools and to prohibit off-leash dog use from November until March, when western snowy plovers may forage in the area. Implementation of these measures would reduce the impact to a ***less than significant*** level, and would achieve policy consistency, but the goal of providing an off-leash recreation area year-round throughout the site would not be achieved. Off-leash dog use at the DFP would be consistent with the balanced use provisions of the Local Coastal Plan, Coastal Act, and the Conservation Element. After mitigation measures have been implemented, biological resource impacts associated with this use would be ***less than significant.***

Hale Park is not subject to Local Coastal Plan and Coastal Act requirements. The proposed project would not result in any unmitigated impacts on biological resources, and would therefore be consistent with Conservation Element policies

d. Cumulative Impacts. The proposed project alternatives would have less than significant project specific impacts except for off-leash dogs within the Shoreline Beach Area. In the Shoreline Beach Area, impacts on tidepools and Arroyo Burro Creek would be significant and would not be reduced to a less than significant level unless dogs are kept on-leash at all times near these areas. However, if the proposed mitigation that involves keeping dogs on-leash in the area of the tide pools is implemented, project impacts to sensitive species in the tidepools

and Arroyo Burro Creek would be less than significant. Other cumulative projects along the California coast that have occurred in the past and are now being reviewed for approval have resulted in impacts to the sensitive species located in tide pools and creeks. The area, including the project site, has already been developed in urban uses and has little potential for future developments that could impact other biological resources. The project would contribute little to the overall cumulative biological impact, provided proposed mitigation measures are implemented. Therefore, the project contribution to cumulative impacts for all of the alternatives at all three sites and the DFPMP would be ***less than significant***.